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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	CASE NO. 2:13-cr-00018-JCM-GWF
)	
Plaintiff,)	
)	
v.)	STIPULATION AND
)	PROTECTIVE ORDER
LEON BENZER,)	
KEITH GREGORY,)	
CHARLES McCHESNEY)	
BARRY LEVINSON,)	
RICKY ANDERSON,)	
MARIA LIMON,)	
JOSE LUIS ALVAREZ,)	
RODOLFO ALVAREZ-RODRIGUEZ,)	
SALVATORE RUVOLO)	
DAVID BALL, and)	
EDITH GILLESPIE,)	
)	
Defendants.)	

IT IS HEREBY STIPULATED AND AGREED between the parties, Denis McNerney, Chief, U.S. Department of Justice, Criminal Division, Fraud Section, Deputy Chief Charles La Bella, and Trial Attorney Thomas B.W. Hall, counsel for the United States, and the following defense counsel:

- David Albregts, counsel for Defendant Leon Benzer

- Rod Snow, counsel for Defendant Keith Gregory
- Jim Oronoz, counsel for Defendant Charles McChesney
- Anthony Sgro, counsel for Defendant Barry Levinson
- Travis Shetler, counsel for Defendant Ricky Anderson
- Gabriel Grasso, counsel for Defendant Maria Limon
- Jess Marchese, counsel for Defendant Jose Luis Alvarez
- Chad Bowers, counsel for Defendant Rodolfo Alvarez
- Bret Whipple, counsel for Defendant Salvatore Ruvolo
- Michael Sanft, counsel for Defendant David Ball
- Chris Rasmussen, counsel for Defendant Edith Gillespie

that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, drivers license numbers, dates of birth, bank account numbers, bank records, or addresses of participants, witnesses and victims in this case. Such documents shall be referred to hereinafter as “Protected Documents.” The parties state as follows:

1. Protected Documents which will be used by the government in its case in chief include personal identifiers, including social security numbers, driver’s license numbers, dates of birth, bank account numbers, bank records, and addresses of participants, witnesses, and victims in this case.

2. Discovery in this case will be voluminous. Many of these documents include personal identifiers. Redacting the personal identifiers of participants, witnesses, and victims would prevent the timely disclosure of discovery to defendants.

3. The United States agrees to provide Protected Documents without redacting the personal identifiers of participants, witnesses, and victims.

1 4. Access to Protected Documents will be restricted to persons authorized by the
2 Court, namely defendants, attorneys of record and attorneys' paralegals, investigators, experts,
3 and secretaries employed by the attorneys of record and performing on behalf of the defendants.

4 5. The following restrictions will be placed on defendants, defendants' attorneys and
5 the above-designated individuals unless and until further ordered by the Court. Defendants,
6 defendants' attorneys and the above-designated individuals shall not:

7 a. make copies for, or allow copies of any kind to be made by any other
8 person of Protected Documents;

9 b. allow any other person to read Protected Documents; and

10 c. use Protected Documents for any other purpose other than preparing to
11 defend against the charges in the Indictment or any superseding indictment arising out of this
12 case.

13 6. Defendants' attorneys shall inform any person to whom disclosure may be made
14 pursuant to this order of the existence and terms of this Court's order.

15 7. The requested restrictions shall not restrict the use or introduction as evidence of
16 discovery documents containing personal identifying information such as social security
17 numbers, driver's license numbers, dates of birth, and addresses during the trial of this matter.

18 8. Upon conclusion of this action, defendants' attorneys shall return to government
19 counsel or destroy and certify to government counsel the destruction of all discovery documents
20 containing personal identifying information such as social security numbers, drivers license
21 numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after
22 the last appeal is final.

23
24 DATED this 28th day of January, 2013.
25
26

/s/ David Albregts

DAVID ALBREGTS

Counsel for Defendant Benzer

Denis J. McInerney

Chief, U.S. Department of Justice

Fraud Section, Criminal Division

/s/ Rod Snow

ROD SNOW

Counsel for Defendant Gregory

/s/ Thomas B.W. Hall

THOMAS B.W. HALL

Trial Attorney, U.S. Dept. of Justice

Criminal Division, Fraud Section

/s/ Jim Oronoz

JIM ORONoz

Counsel for Defendant McChesney

/s/ Anthony Sgro

ANTHONY SGRO

Counsel for Defendant Levinson

/s/ Travis Shetler

TRAVIS SHETLER

Counsel for Defendant Anderson

/s/ Gabriel Grasso

GABRIEL GRASSO

Counsel for Defendant Limon

/s/ Jess Marchese

JESS MARCHESE

Counsel for Defendant J. L. Alvarez

/s/ Chad Bowers

CHAD BOWERS

Counsel for Defendant R. Alvarez

/s/ Bret Whipple

BRET WHIPPLE

Counsel for Defendant Ruvolo

/s/ Michael Sanft

MICHAEL SANFT

Counsel for Defendant Ball

/s/ Chris Rasmussen

CHRIS RASMUSSEN

Counsel for Defendant Gillespie

ORDER

IT IS SO ORDERED this 29th day of January 2013.


UNITED STATES MAGISTRATE JUDGE

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